

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO**

DISABILITY RIGHTS NEW MEXICO, INC.,

Plaintiff,

v.

Case No. 1:22-CV-00954 WJ/JFR

TAFOYA LUCERO, et al.,

Defendants.

JOINT MOTION TO STAY PROCEEDINGS UNTIL SEPTEMBER 1, 2023

THE PARTIES, through their undersigned counsel, respectfully request this Court stay all proceedings in this case until September 1, 2023 so the Parties can conduct negotiations in this matter. The grounds for this motion are:

1. The Parties agree to an additional stay of proceedings;
2. The previous stay expired on July 3, 2023;
3. The Parties agree to a stay of an additional sixty days from July 3, 2023 until September 1, 2023;
4. The Parties will continue to meet to conduct negotiations in this matter;
5. The Parties agree that once the stay expires or is lifted, Plaintiff may file an Unopposed Motion to Surreply to Defendants' Motion to Dismiss; and
6. The Parties seek this stay in the interest of conserving judicial resources and the resources of the parties while they conduct negotiations.

For the above-stated reasons, the parties respectfully request that the Court enter an order staying all proceedings in this case until September 1, 2023.

Respectfully submitted,

**AMERICAN CIVIL LIBERTIES
UNION OF NEW MEXICO**

/s/ Maria Martinez Sanchez

Maria Martinez Sanchez
Lalita Moskowitz
1401 Coal Ave. SW
Albuquerque, NM 87104
(505) 266 5915 ext. 1015
(505) 266 5916 (fax)
lmoskowitz@aclu-nm.org
msanchez@aclu-nm.org

Maxwell Kauffman
DISABILITY RIGHTS NEW MEXICO
3916 Juan Tabo Blvd., NE
Albuquerque, NM 87111
(505) 256-3100
(505) 256-3184 (Fax)
mkauffman@drnm.org

Katherine Loewe
THE LAW OFFICE OF RYAN J. VILLA
5501 Eagle Rock Ave, NE Suite C2
Albuquerque, NM 87113
(505) 256 7690
(505) 433 5812 (fax)
kate@rjvlawfirm.com

Attorneys for Plaintiff

and

Mark Komer
Long Komer & Associates
P.O. Box 5098
Santa Fe, NM 87502-5098
(505) 982-8405
mark@longkomer.com

Attorney for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was served upon all counsel of record via the CM/ECF system on this 5th day of July 2023.

/s/ Maria Martinez Sanchez
Maria Martinez Sanchez